

ADDENDUM TO THE FACT SHEET  
FOR STATE WASTE DISCHARGE  
PERMIT NO. ST 6175  
April 2009

I. GENERAL INFORMATION

Facility: Marine Industries Northwest, Inc.  
313 East F Street  
Tacoma, WA 98421

II. APPLICATION REVIEW

Marine Industries Northwest, Inc. (MINW) submitted an application to Ecology which was received on April 2, 2008, for permit reissuance, and Ecology accepted it on April 30, 2008. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- MINW has, for the most part, complied with all of the terms, conditions, requirements and schedules of compliance of the expired permit. They submitted several late DMRs and violated permit limits a few times.
- Ecology has up-to date information on most of the facility's waste treatment practices; and the nature, content, volume, and frequency of its discharge. Ecology is working with MINW to obtain current copies of their Operation & Maintenance Manual, Spill Plan, and Solid Waste Control Plan.
- The discharge meets applicable effluent standards and limits and other legally applicable requirements. It is in the process of obtaining more data so Ecology can assess compliance with antidegradation requirements of the ground water quality standards.

III. PERMIT REAUTHORIZATION

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on ground water which may lead to changes in the limits, terms and conditions of the permit.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of wastewater to an infiltration basin close to the Middle Waterway, Inner Commencement Bay. The previous fact sheet explains the basis for the discharge limitations and conditions of the reauthorized permit and remains as part of the administrative record.

Ecology determined it does not need to change the existing permit requirements, including discharge limits and monitoring, to protect the ground water quality at this time. Ecology has determined that there is still insufficient data to adequately evaluate whether or not the antidegradation provisions of the Ground Water Quality Standards have been met. Ecology recommends collecting five years of additional data which will be evaluated during the next permit renewal process.

The previous fact sheet addressed conditions and issues at the facility at the time when Ecology issued the previous permit in 2004. Since the issuance of the current permit, Ecology has not received any additional information which indicates that environmental impacts from the discharge warrant a complete renewal of the permit. The reauthorized permit is virtually identical to the previously modified permit issued on October 21, 2005.

Ecology reviewed inspections and assessed compliance of the MINW's discharge with the terms and conditions in the previous permit and determined that it should not rank the facility as a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where ground water quality would benefit from a more stringent permit during the next five-year cycle.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. For permit reissuance planning purposes, Ecology follows a system of ranking that considers the benefit gained by renewing a permit rather than reauthorizing a permit during its annual permit planning process. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance. Ecology notifies the public and seeks input after it has tentatively established the initial draft ranking of the permits it plans to renew and those it plans to reauthorize. Ecology considers all relevant comments and suggestions before it makes a final decision.

Ecology carried over the discharge limits and conditions in effect at the time of expiration of the previous permit to this reauthorized permit. Ecology changed the submittal dates for reports from those in the previous permit. Ecology removed the completed report requirements that do not require additional or continued assessment. It adjusted the dates for the other standard compliance and submittal requirements that it carried over from the past permit into this reauthorized permit. Ecology considered these reports necessary in the previous permit and no information has come forward to cause it to reconsider.

Ecology included a new Appendix A in the reauthorized permit which provides testing methods, detection limits, and method reporting limits that are required for testing as part of the permit renewal application and for routine permit compliance monitoring. Special Condition S1 has been revised to require conformance with the specifications provided in the new Appendix A table.

Also, Ecology changed the BMP requirement for floats used for in-water vessel maintenance from a minimum of 1-inch of freeboard to a minimum of 6-inches of freeboard. The 1-inch requirement was not realistically implementable.

Ecology must public notice the availability of the draft reauthorized permit at least 30 days before it reissues the permit [Washington Administrative Code (WAC) 173-220-050]. Ecology invites you to review and comment on its decision to reauthorize the permit (see Appendix A-Public Involvement of the Fact Sheet for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will prepare a response to comments document that it will attach to this fact sheet addendum. The response to comments will include the resultant changes to the permit and either address each comment individually or summarize the substantive comments and respond. Ecology sends a copy of the response to comments to all parties who submitted comments. Ecology will include the response to comments in this fact sheet addendum.

#### IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reissue this permit for five years.

## APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to reissue a permit to Marine Industries Northwest, Inc. The permit includes wastewater discharge limits and other conditions. This fact sheet addendum describes the facility and Ecology's reasons for reauthorizing the permit conditions.

Ecology placed a Public Notice of Application on June 9, 2008, and June 16, 2008, in the *Tacoma News Tribune* to inform the public about the submitted application and to invite comment on the reissuance of this permit.

Ecology will place a Public Notice of Draft on March 6, 2009, in the *Tacoma News Tribune* to inform the public and to invite comment on the proposed draft State Waste Discharge permit and fact sheet addendum.

The Notice –

- Tells where copies of the draft Permit and Fact Sheet are available for public evaluation (a local public library, the closest Regional or Field Office, posted on our website.).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed State Waste Discharge Permit.
- Explains the next step(s) in the permitting process.

Ecology has published a document entitled **Frequently Asked Questions about Effective Public Commenting** which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone, **360-407-6280**, or by writing to the permit writer at the address listed below.

Industrial Unit Permit Coordinator  
Department of Ecology  
Southwest Regional Office  
P.O. Box 47775  
Olympia, WA 98504-7775

The primary author of this permit and fact sheet is John Y. Diamant, P.E.

## **APPENDIX A – RESPONSE TO COMMENTS**

A Comment was received from Citizens for a Healthy Bay (CHB). CHB's comment is provided below:

In brief, given MINI's historical NPDES problems, CHB is concerned about the possible relationship between increased metals in sediments noted in 2008 during the post-remedial sampling and discharges from MINI. EPA is requiring that MWAC re-sample sediments in 2009 but we won't know that trend until later this year.

Ecology's response is provided below:

Ecology recognizes and shares CHB's concerns regarding recontamination of sediments after remedial action has been completed. Ecology is looking forward to reviewing the 2009 MWAC sediment data and any conclusions that the data may provide. If MINI adheres to the State Waste Discharge Permit, no recontamination of the Middle Waterway should occur since the discharge of treated hydroblast water and stormwater is to ground via an infiltration basin. Ecology continues to encourage MINI to evaluate and improve upon their structural and operational BMPs to further minimize/prevent any pollutants from entering the Waterway.

The NPDES permit (already reissued) covers any incidental discharges which may occur from pierside vessel maintenance. The NPDES permit relies on the use of BMPs to control and prevent pollutants from entering the Waterway. Ecology continues to encourage MINI to evaluate and improve upon their structural and operational BMPs to further minimize/prevent any pollutants from entering the Waterway.